

**Exhibit 1**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re:**

**Professional Fee Matters Concerning the  
Jackson Walker Law Firm**

**Case No. 23-00645 (EVR)**

**THE UNITED STATES TRUSTEE'S CROSS-NOTICE OF  
DEPOSITION FOR DAVID R. JONES**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Bankr. P. 7030, the United States Trustee will take the deposition of DAVID R. JONES on **July 18, 2024**, beginning at 9:00 a.m. (CDT) or such other date and time as may be agreed by the parties, at the offices of Rusty Hardin & Associates, LLP, 1401 McKinney Street, Suite 2250, Houston, TX 77010. The deposition will be conducted by oral examination before a certified court reporter and will continue from day to day until complete. The deposition will be recorded by stenographic means and may be videotaped.

The United States Trustee's deposition topic list is attached as **Exhibit A** and his document rider (previously served on July 1, 2024) is attached as **Exhibit B**.

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Dated: July 3, 2024

Respectfully Submitted,

KEVIN M. EPSTEIN  
UNITED STATES TRUSTEE

By: /s/ Alicia L. Barcomb

Millie Aponte Sall, Assistant U.S. Trustee  
Tex. Bar No. 01278050/Fed. ID No. 11271  
Vianey Garza, Trial Attorney  
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**CERTIFICATE OF SERVICE**

I certify that on July 3, 2024, I served the foregoing via electronic mail to the below:

Quinn Emanuel Urquhart & Sullivan, LLP  
Benjamin Finestone  
([benjaminfinestone@quinnemanuel.com](mailto:benjaminfinestone@quinnemanuel.com))  
*Counsel for David Jones*

**NORTON ROSE FULBRIGHT US LLP**  
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-and-

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*Counsel for Jackson Walker LLP*

By: /s/ Alicia L. Barcomb  
Alicia L. Barcomb

## EXHIBIT A

### ***Topics for Deposition<sup>1</sup>***

1. The nature and timeline of former bankruptcy judge David R. Jones's ("Jones") romantic relationship, cohabitation, financial relationship, or joint home ownership with Elizabeth Freeman ("Freeman").
2. Freeman's presence at or involvement in any mediation conducted by Jones in any of the cases listed on Exhibit 6 to the United States Trustee's *Motion for Relief from Judgment or Order Pursuant to Federal Rule of Civil Procedure 60(b)(6) and Federal Rule of Bankruptcy Procedure 9024 Approving any Jackson Walker Applications for Compensation and Reimbursement of Expenses*, attached hereto as Exhibit A-1.
3. Jones's attendance at any social events relating to any mediation conducted by Jones in any of the cases listed on Exhibit 6 to the United States Trustee's *Motion for Relief from Judgment or Order Pursuant to Federal Rule of Civil Procedure 60(b)(6) and Federal Rule of Bankruptcy Procedure 9024 Approving any Jackson Walker Applications for Compensation and Reimbursement of Expenses*, attached hereto as Exhibit A-1.
4. Any disparate treatment of Jackson Walker, LLP ("Jackson Walker") or Freeman, or any biased or prejudicial rulings or orders involving Jackson Walker or Freeman, in any of the cases listed on Exhibit A-1 by Jones as a result of his romantic relationship, cohabitation, financial relationship or joint home ownership with Freeman.
5. Jones's understanding of the reasons for Jackson Walker's popularity as local counsel.
6. Jones's analysis and conclusion that the disclosure of his romantic relationship, cohabitation, financial relationship, or joint home ownership with Freeman was not necessary in matters in which he acted as either judge or mediator.
7. Any disclosure by Jones of his romantic relationship, cohabitation, financial relationship, or joint home ownership with Freeman to any person at Jackson Walker.
8. Any residences or other real property jointly purchased or owned by Jones and Freeman.
9. Visits by any Jackson Walker attorneys to a residence or other real property owned by Jones or Freeman.
10. Any social events, whether private or public, that any Jackson Walker attorneys attended where Jones and Freeman were also present.

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<sup>1</sup> The topics for deposition largely mirror those contained in Jackson Walker LLP's Second Amended Notice of Deposition for David R. Jones, *In re Professional Fee Matter Concerning the Jackson Walker Law Firm*, Case No. 23-00645 (Bankr. S.D. Tex. June 25, 2024).

11. The knowledge of any person at Jackson Walker (other than Freeman) of the romantic relationship, cohabitation, financial relationship, or joint home ownership between Jones and Freeman.
12. The knowledge of other individuals in the Houston legal community of the romantic relationship, cohabitation, financial relationship, or joint home ownership between Jones and Freeman.
13. Jones's approvals of Jackson Walker's fee applications or retention applications in any of the cases listed on Exhibit A-1.
14. Jones's involvement in the adversary proceeding captioned *Michael Van Deelen v. David Dickson, et al.*, Case No. 20-03309, filed in the Bankruptcy Court for the Southern District of Texas (Houston Division), including the motion for recusal and related documents.
15. Any payments made by Jackson Walker or Freeman on Jones's behalf in relation to any of the cases listed on Exhibit A-1, including any cases that Jones mediated in which Jackson Walker represented a party.

## Exhibit A-1

**Exhibit 6A**  
**Judge Jones**  
**Jackson Walker Fee Order Entered**  
**Open Cases**

Debtor Name	Case Number	Petition Date	Confirmation Status	Position	Date of Retention App	Retention App ECF	Fee App Order ECF	Total Fees Awarded	Total Expenses	Ms. Freeman Fees
Westmoreland Coal Company	18-35672	10/9/2018	Confirmed	Debtor Local Counsel	11/8/2018	376	2249	\$676,806.00	\$87,114.29	\$129,629.50
J.C. Penney Company, Inc.	20-20182	5/15/2020	Confirmed	Debtor Local Counsel	6/11/2020	685	2874	\$1,087,263.00	\$14,219.21	\$286,159.00
Whiting Petroleum Corporation	20-32021	4/1/2020	Confirmed	Debtor Local Counsel	4/17/2020	173	840	\$695,091.50	\$3,541.94	\$36,115.00
Neiman Marcus Group LTD, LLC	20-32519	5/7/2020	Confirmed	Debtor Local Counsel	6/3/2020	750	2147	\$380,573.50	\$6,103.70	\$49,910.00
Stage Stores LLC	20-32564	5/10/2020	Confirmed	Debtor Local Counsel	6/4/2020	385	983	\$182,655.50	\$2,090.65	\$29,295.00
Chesapeake Energy Corporation	20-33233	6/28/2020	Confirmed	Debtor Local Counsel	7/16/2020	370	3509	\$912,742.00	\$21,275.94	\$192,258.00
Covia Holdings Corporation	20-33295	6/29/2020	Confirmed	Debtor Conflicts Counsel	7/21/2020	195	1304	\$325,181.00	\$6,200.85	\$51,021.00
Bouchard Transportation Co., Inc.	20-34682	9/28/2020	Confirmed	Debtor Local Counsel	10/28/2020	173	20-34758 at 63	\$436,790.00	\$5,371.86	\$23,380.00
Mule Sky LLC (Gulfport Energy)	20-35561	11/13/2020	Confirmed	Debtor Conflicts Counsel	12/11/2020	20-35562 at 390	212	\$765,173.50	\$7,334.20	\$54,525.50
Seadrill Partners LLC	20-35740	12/1/2020	Confirmed	Debtor Local Counsel	12/23/2020	110	690	\$286,885.00	\$1,617.25	\$28,223.00
Seadrill Limited	21-30427	2/10/2021	Confirmed	Debtor Local Counsel	3/8/2021	250	1340	\$501,242.00	\$2,123.05	\$5,594.50
Brilliant Energy, LLC	21-30936	3/16/2021	No Plan	Other	4/13/2021	68	241	\$186,363.50	\$2,246.63	\$0.00
Katerra Inc.	21-31861	6/6/2021	Confirmed	Debtor Local Counsel	6/29/2021	289	1639	\$858,653.01	\$3,934.72	\$0.00

## Exhibit A-1

Debtor Name	Case Number	Petition Date	Confirmation Status	Position	Date of Retention App	Retention App ECF	Fee App Order ECF	Total Fees Awarded	Total Expenses	Ms. Freeman Fees
Basic Energy Services, Inc.	21-90002	8/27/2021	Confirmed	Debtor Lead Counsel	12/13/2021	809	1511	\$1,543,432.34	\$3,082.84	\$0.00
Strike LLC	21-90054	12/6/2021	Confirmed	Debtor Local Counsel	1/6/2022	363	1248	\$875,026.00	\$12,331.41	\$0.00
4E Brands Northamerica LLC	22-50009	2/22/2022	Confirmed	Debtor Lead Counsel	3/24/2022	72	427-1	\$859,425.50	\$7,300.81	\$0.00
Sungard AS New Holdings	22-90018	4/11/2022	Confirmed	Debtor Conflicts Counsel	5/10/2022	211	897	\$414,495.00	\$5,966.56	\$0.00

**Totals \$10,987,798.35 \$191,855.91 \$886,110.50**



## Exhibit A-1

**Exhibit 6B**  
**Judge Jones**  
**Jackson Walker Fee Order Entered**  
**Closed Cases**

Debtor Name	Case Number	Petition Date	Confirmation Status	Position	Date of Retention App	Retention App ECF	Fee App Order ECF	Total Fees Awarded	Total Expenses Awarded	Ms. Freeman Fees
Jones Energy Inc.	19-32112	4/14/2019	Confirmed	Debtor Local Counsel	4/23/2019	125	251	\$92,854.00	\$20,915.86	\$10,582.00
McDermott International Inc.	20-30336	1/21/2020	Confirmed	Debtor Local Counsel	2/19/2020	424	1021	\$391,655.00	\$21,154.16	\$114,002.50
Sheridan Holding Company I, LLC	20-31884	3/23/2020	Confirmed	Debtor Local Counsel	4/2/2020	130	213	\$11,779.50	\$12,025.30	\$3,565.00
Hornbeck Offshore Services, Inc.	20-32679	5/19/2020	Confirmed	Debtor Conflicts Counsel	6/1/2020	132	283	\$61,428.00	\$798.75	\$4,727.50
Denbury Resources Inc.	20-33801	7/30/2020	Confirmed	Debtor Local Counsel	8/28/2020	238	384 & 442	\$124,321.50	\$890.07	\$37,122.50
iQor Holdings Inc.	20-34500	9/10/2020	Confirmed	Debtor Local Counsel	9/28/2020	154	252	\$63,842.00	\$3,857.50	\$1,670.00
Volusion, LLC	20-50082	7/27/2020	Confirmed	Debtor Lead Counsel	8/26/2020	74	172	\$339,428.00	\$3,025.97	\$62,897.00
Seadrill New Finance Limited	22-90001	1/11/2022	Confirmed	Debtor Local Counsel	2/8/2022	94	121	\$27,286.00	\$21,067.75	\$0.00
LaForta - Gestao e Investimentos	22-90126	6/16/2022	No Plan	Debtor Lead Counsel	7/15/2022	67	298	\$505,907.50	\$7,946.11	\$0.00
<b>Totals</b>								<b>\$1,618,501.50</b>	<b>\$91,681.47</b>	<b>\$234,566.50</b>

## Exhibit A-1

**Exhibit 6C**  
**Jones Mediation Cases**  
**Jackson Walker Fees/Expenses**  
**Open Cases**

Debtor Name	Case Number	Petition Date	Judge	Confirmation Status	Position	Date of Retention App	Retention App ECF	Fee App Status	Fee App Order ECF	Total Fees Awarded	Total Expenses Awarded	Ms. Freeman Fees
Sanchez Energy Coporation	19-34508	8/11/2019	Isgur	Confirmed	Debtor Local Counsel	10/1/2019	269	Final Approved	1502	\$1,905,683.35	\$98,468.48	\$531,384.50
GWG Holdings Inc.	22-90032	4/20/2022	Isgur	Confirmed	Debtor Local Counsel	5/19/2022	267	Final Pending		\$801,232.50	\$59,972.91	\$228,572.81
HONX, Inc.	22-90035	4/28/2022	Isgur	Plan Pending	Debtor Local Counsel	5/31/2022	128	Interim Filed		\$393,782.00	\$7,681.61	\$71,790.00
Altera Infrastructure LP	22-90130	8/12/2022	Isgur	Confirmed	Debtor Local Counsel	9/12/2022	228	Final Approved	22-90129 at 20	\$357,209.50	\$6,739.23	\$53,445.00
IEH Auto Parts Holding LLC	23-90054	1/31/2023	Lopez	Confirmed	Debtor Lead Counsel	3/2/2023	181	Final Pending				
IEH Auto Parts Holding LLC	23-90054	1/31/2023	Lopez	Confirmed	Debtor Conflicts Counsel	3/2/2023	183	None Filed				
MLCJR LLC	23-90324	5/14/2023	Lopez	No Plan	Debtor Conflicts Counsel	6/13/2023	433	Interim Filed				
<b>Totals</b>										<b>\$3,457,907.35</b>	<b>\$172,862.23</b>	<b>\$885,192.31</b>

## Exhibit A-1

**Exhibit 6D**  
**Jones Mediation Cases**  
**Jackson Walker Fees/Expenses**  
**Closed Cases**

Debtor Name	Case Number	Petition Date	Judge	Confirmation Status	Position	Date of Retention App	Retention App ECF	Fee App Status	Fee App Order ECF	Total Fees Awarded	Total Expenses Awarded	Ms. Freeman Fees
EXCO Resources, Inc.	18-30155	1/15/2018	Isgur	Confirmed	UCC Local Counsel	2/26/2018	382	Final Approved	122	\$1,820,436.59	\$68,949.97	\$185,702.50
Tailored Brands, Inc.	20-33900	8/2/2020	Isgur	Confirmed	Debtor Local Counsel	9/1/2020	496	Final Approved	1404	\$253,420.00	\$1,482.05	\$57,345.00
<b>Total</b>										<b>\$2,073,856.59</b>	<b>\$70,432.02</b>	<b>\$243,047.50</b>

**EXHIBIT B**

**RIDER TO SUBPOENA**

***(In re Professional Fee Matters Concerning the Jackson Walker Firm, Case No. 23-645)***

**DEFINITIONS**

As used herein, the following terms will have the meanings set forth below:

- (a) **“Document”** or **“documents”** means and is intended to have the broadest possible meaning and includes any writings whatsoever, electronic transmissions, e-mails and attachments thereto, drawings, reports, records, notes, instructions, memoranda, drafts (whether or not they resulted in a final document), audio recordings, billing statements (including drafts), communications, correspondence, contracts, letters, graphs, charts, photographs, filings, forms, journals, ledgers, letters, lists, minutes, notations, notes, opinions, orders, pamphlets, papers, publications, receipts, summaries, screenshots, social media posts, telegrams, telephone records, text messages, video recordings and voicemail messages.
- (b) **“Freeman”** means Elizabeth Freeman, a former partner at Jackson Walker and presently with The Law Office of Liz Freeman, PLLC and each past and present agent, representative, attorney, expert, insurer, executor, administrator, or anyone acting on her behalf.
- (c) **“You”** or **“Your”** means David R. Jones, both in a personal capacity and as a former Judge of the United States Bankruptcy Court for the Southern District of Texas, and each past and present agent, representative, attorney, expert, insurer, executor, administrator, employee, or anyone acting on your behalf.
- (d) **“Jackson Walker”** means Jackson Walker LLP and each past and present officer, director, attorney, partner, associate, employee, independent contractor, agent, servant, and each representative of such entity or individual.
- (e) **“Relationship”** means any personal relationship between you and Freeman, including intimate, financial, fiduciary, cohabitating, romantic or sexual.
- (f) **“Relevant Cases”** means (i) each case listed on Exhibit 6 to the United States Trustee’s Motion for Relief from Judgment or Order Pursuant to Federal Rule of Civil Procedure 60(b)(6) and Federal Rule of Bankruptcy Procedure 9024 Approving any Jackson Walker Applications for Compensation and Reimbursement of Expenses filed in this case, and (ii) any cases in which both Jackson Walker and the Law Office of Liz Freeman worked, including *In re Tehum*

*Care Services, Inc.* (Case No. 23-90086), *In re Venator Materials PLC* (Case No. 23-90301), *In re Diebold Nixdorf Dutch Holding B.V.* (Case No. 23-90729), *In re Sorrento Therapeutics, Inc.* (Case No. 23- 90085) and *In re QualTek Services Inc.* (Case No. 23-90584), each filed in the Bankruptcy Court for the Southern District of Texas (Houston Division). For the avoidance of doubt, each listed case includes all affiliated and related debtors.

- (g) **“Van Deelen Litigation”** means the Adversary Proceeding known as Case No. 20-03309 filed in the Bankruptcy Court for the Southern District of Texas (Houston Division) and the Complaint filed by Michael D. Van Deelen commencing Case No. 4:23-cv-03729 pending in the United States District Court for the Southern District of Texas (Houston Division).
- (h) **“Relate(d) to”** or **“relating to”** means constituting, defining, concerning, embodying, reflecting, identifying, stating, referring to, bearing upon, dealing with, or in any way pertaining to a subject matter.
- (i) The disjunctive **“or”** shall include the conjunctive **“and.”**

### **DOCUMENTS TO BE PRODUCED<sup>1</sup>**

Please produce the following documents in **native format** and submit via email (or emails) to Jennifer.R.Toth@usdoj.gov no later than 5:00 p.m. CST July 31, 2024, with the case name and number in the subject line. The documents must be organized by the numbered request and must clearly indicate the request(s) to which they relate.

**Include a complete inventory for all documents that are produced. In the event that You do not have any documents responsive to a particular request, please provide an affidavit stating as such.** If You are unable to provide the documents via email(s), please contact Jennifer Toth for additional production procedures. Unless expressly stated otherwise, each request seeks documents within the period of January 1, 2018, through October 7, 2023. If You are withholding any requested documents on the basis of attorney-client privilege or attorney work product privilege, You must provide a privilege log.

1. All documents relating to any interests in any real property You held jointly with Freeman at any time.
2. All documents related to any expenses that You and Freeman either (a) shared or (b) paid on behalf of the other, in whole or in part, at any time prior to October 7, 2023, including tuition, credit card bills, tickets or entertainment expenses, taxes, loan payments, insurance premiums, household or improvements or any other household expenses.
3. All documents, including all trust agreements and asset transfer documents, relating to any trusts in existence at any time through October 7, 2023, for which You were the settlor and/or trustee and Freeman was a beneficiary in any capacity.
4. All life insurance policies for which You were the insured and for which Freeman was a beneficiary at any time through October 7, 2023.
5. All documents related to any wills or testamentary trusts You had at any time through October 7, 2023, that named Freeman as an executor and/or a beneficiary in any capacity.
6. All documents related to any financial investment account, including checking, savings, money market, certificates of deposit, exchange traded funds, mutual funds, IRAs, 401(k)s, brokerage accounts, real estate investment trusts, shares of stock, bonds, or cryptocurrencies, in which You had an interest at any time

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<sup>1</sup> The U.S. Trustee does not believe the documents requested pertain to official court information, and therefore are not subject to Judicial Policy § 830(a). Please advise the U.S. Trustee at your earliest opportunity if you disagree and believe that any document requested seeks official court information.

through October 7, 2023, that named Freeman as a joint owner, signatory or beneficiary.

7. All documents related to any vehicles, including automobiles, trucks, boats or other watercraft, sport utility vehicles, trailers, aircraft, motor homes, or motorcycles, in which You and Freeman had a joint interest in at any time through October 7, 2023.
8. All documents related to the transfer of any interest in real property from You to Freeman and from Freeman to You at any time through October 7, 2023.
9. All documents related to the transfer of any personal property, including gifts, valued at \$1,000 or more from You to Freeman or from Freeman to You at any time through October 7, 2023.
10. All documents related to any debts for which You and Freeman were co-obligors at any time through October 7, 2023.
11. All documents related to any traveling You did in which Freeman attended in any way at any time through October 7, 2023.
12. All documents related to any travel costs that You or Freeman paid in amounts greater than \$500, directly or indirectly, for or on behalf of the other at any time through October 7, 2023, other than trips within the Texas counties of Austin, Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller, including but not limited to the transfer of airline miles.
13. All documents related to Your designation of Freeman as Your emergency contact or where Freeman designated You as her and her dependents' emergency contact in effect at any time through October 7, 2023.
14. All documents related to Your advanced directives, including living wills, durable powers of attorney, and medical or health care powers of attorney in which You named Freeman as your agent, in effect at any time through October 7, 2023.